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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ERIN KUHN-BROWN,

Plaintiff,

v.

DWIGHT NEVEN, et al.,

Defendants.

Case No. 2:19-cv-01140-RFB-MDC

**STIPULATION AND ORDER TO  
EXTEND PLAINTIFF'S  
RESPONSE/OPPOSITION TO  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

**(FIRST REQUEST)**

Plaintiff, ERIN KUHN-BROWN, by and through her attorney of record, Lawrence J. Semenza, Esq., of the law firm of Lawrence J. Semenza, Ltd., and Defendants, by and through their Attorney of Record, Aaron D. Ford, Nevada Attorney General, and Leo T. Hendges, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby file their first Stipulation to Extend Plaintiff's time to respond/oppose Defendants' Motion for Summary Judgment due to be filed July 28, 2025.

**I. SUMMARY JUDGMENT MOTION**

Defendants' Motion for Summary Judgment was filed and served on July 7, 2025, and included some 19 Exhibits, consisting of Declarations in support of the Motion and Exhibits consisting of Plaintiff's grievances filed at Florence McClure Women's Correctional Institution.

Counsel for Plaintiff has been working with his client to prepare the response/opposition but will not be able to meet the deadline of July 28, 2025.

Counsel for the respective parties have agreed to extend Plaintiff's response/opposition to and including Monday, August 18, 2025.

DATED this 18<sup>th</sup> day of July 2025.

DATED this 18<sup>th</sup> day of July 2025

LAWRENCE J. SEMENZA, LTD.

AARON D. FORD  
ATTORNEY GENERAL

/s/ Lawrence J. Semenza

/s/ Leo T. Hendges

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Leo T. Hendges, Bar No. 16034  
Senior Deputy Attorney General  
1 State of Nevada Way Suite 100  
Las Vegas, NV 89119

*Attorneys for Plaintiff Erin Kuhn-Brown*

*Attorney for Defendants*

**IT IS SO ORDERED.**

**DATED** this 25th day of July, 2025.

  
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**RICHARD F. BOULWARE, II**  
**UNITED STATES DISTRICT JUDGE**

Submitted by:

LAWRENCE J. SEMENZA, LTD.

/s/ Lawrence J. Semenza

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